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November 15, 2023

Hon. Lorna Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Cypress Holdings, III, LLP v. George Hall, et al.*
Case No.: 22-cv-01243 (LGS)

Your Honor:

I am the attorney for plaintiff Cypress Holdings, III, L.P. (“Cypress”). On October 31, 2023, Your Honor granted substitution of the undersigned as counsel of record in the place of A. Ross Pearson, Esq. and Chiesa, Shahinian & Giantomaso. (Dkt. 162). On October 13, 2023, prior to being substituted a counsel, the Court approved the parties Rule 23.1 briefing schedule, which was as follows: Sport-BLX parties shall file their Rule 23.1 motion and memorandum of law by October 27, 2023; the Cypress parties shall file their opposition brief by November 17, 2023; and the Sport-BLX parties shall file their reply brief by November 29, 2023. (Dkt. 152). The first part of the plaintiff’s file was transferred to my office on November 9, 2023. The second portion, consisting of over 20 GB is supposed to be received today.

As a result of the voluminous file and Thanksgiving Recess starting on November 23, 2023, subject to Your Honor’s approval, the parties have agreed on the following revised briefing schedule:

- a. The Cypress parties shall file their opposition brief by December 4, 2023; and
- b. The Sport-BLX parties shall file their reply brief by December 15, 2023.

This is the first request for a modification of the Rule 23.1 motion schedule. This application is made on the consent of the defendants.

Thank you for your consideration.

Very truly yours,

/s/ Alexander Dudelson

Alexander M. Dudelson

Via ECF: All parties